

Hearing Date: March 25, 2021
Hearing Time: 12:00 P.M.
Hearing Location: Syracuse, New
York (telephonically)

IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF NEW YORK

In re: Chapter 11

The Roman Catholic Diocese of Syracuse,
New York, Case No. 20-30663-5 (MCR)

Debtor.

The Roman Catholic Diocese of Syracuse,
New York,

Plaintiff, Adv. Proc. No. 21-50005

v. **NOTICE OF MOTION**

LG 35 DOE, LG 42 DOE, LG 43 DOE,
LG 44 DOE, LG 79 DOE, and LG 86 DOE,

Defendants.

PLEASE TAKE NOTICE that a Motion will be made for the relief specified herein in connection with the above entitled action as follows:

MOVING PARTY: Potential Creditors and Adversary Proceeding Defendants, LG 35 DOE, LG 42 DOE, LG 43 DOE, LG 44 DOE, LG 79 DOE and LG 86 DOE (hereinafter collectively referred to as the “LG Doe Victims”).

TIME & PLACE: United States Bankruptcy Court, Northern District of New York, James M. Hanley U.S. Courthouse and Federal Building, 100 South Clinton Street, Syracuse, New York, 13261 before the Honorable

Margaret Cangilos-Ruiz, United States Bankruptcy Judge for the Northern District of New York on March 25, 2021 at 12:00 P.M., said hearing to be held telephonically by dial-in number 1-888-398-2342, access code 3187406, or at such other date and time set by the Court.

RELIEF SOUGHT AND GROUNDS THEREFORE:

An Order Granting LG Doe Victims Motion to Reconsider the Order Approving Stipulation and Order Pursuant to 11 U.S.C. § 105(a) Staying Continued Prosecution of Certain Lawsuits, to Remove Certain Language in Paragraph 3 of said Order, and for such other and further relief that this Court deems just and appropriate, pursuant to Rule 9023 of the Federal Rules of Bankruptcy Procedure and Rule 59 of the Federal Rules of Civil Procedure.

SUPPORTING PAPERS:

This Notice of Motion and the Motion for Reconsideration of the Order Approving Stipulation and Order Pursuant to 11 U.S.C. 105(a) Staying Continued Prosecution of Certain Lawsuits, along with the exhibits annexed thereto.

Dated: February 22, 2021
Buffalo, New York

By: /s/ Amy C. Keller

Amy C. Keller, Esq.

LIPSITZ GREEN SCIME CAMBRIA LLP

Attorneys for Defendants, LG 35 Doe, LG 42 Doe, LG 43 Doe, LG 44 Doe, LG 79 Doe and LG 86 Doe
42 Delaware Avenue, Suite 120
Buffalo, New York 14202
Phone: (716) 849-1333 ext. 439
E-mail: akeller@lglaw.com

TO: Bond, Schoeneck & King, PLLC
Attn: Stephen A. Donato, Esq.
Brian Jacob Butler, Esq.
Charles J. Sullivan, Esq.
Grayson Walter, Esq.

Attorneys for Debtor/Plaintiff

One Lincoln Center
Syracuse, New York 13202
Phone: (315) 218-8000
sdonato@bsk.com
butlerb@bsk.com
csullivan@bsk.com
gwalter@bsk.com

Stephen T. Helmer, Esq.
Mackenzie Hughes LLP
Attorneys for Debtor/Plaintiff
440 S. Warren St
Suite 400
Syracuse, NY 13202
shelmer@mackenziehughes.com

CC: Erin Champion, Esq.
Office of the United States Trustee
105 U.S. Courthouse
10 Broad St.
Utica, NY 13501
USTPRegion02.UT.ECF@usdoj.gov

Robert T. Kugler, Esq.
Edwin Caldie, Esq.
Stinson LLP
Attorneys for the Official Committee of Unsecured Creditors
50 South Sixth Street, Suite 2600
Minneapolis, MN 55402
612-335-1645
robert.kugler@stinson.com
ed.caldie@stinson.com

Merritt S. Locke, Esq.
Saunders Kahler, LLP
Attorneys for the Official Committee of Unsecured Creditors
185 Genesee Street
Suite 1400
Utica, New York 13501
315-733-0419
mlocke@saunderskahler.com

Timothy P. Lyster, Esq.
Woods Oviatt Gilman LLP
Attorneys for Parish Steering Committee
1900 Bausch & Lomb Place
Rochester, NY 14604
585-987-2894
tlyster@woodsoviatt.com

Ford Elsaesser, Jr., Esq.
Elsaesser Anderson, Chtd.
Attorneys for Parish Steering Committee
320 E. Neider Avenue – Suite 102
Coeur d'Alene, ID 83815
208-667-2900
felsaesser@eaidaho.com